



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

May 13, 2005

Andrea Green, Treasurer  
Human Rights Campaign PAC  
1640 Rhode Island Avenue NW  
Washington, DC 20036

**Response Due Date:**  
**June 13, 2005**

Identification Number: C00235853

Reference: Amended 30 Day Post-General Report (10/14/04-11/22/04), received  
1/27/05

Dear Ms. Green:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-The beginning cash balance of this report should equal the ending balance of your 2004 12 Day Pre-General Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Schedule B of your report discloses a \$9,850.00 payment(s) to your connected organization for "in-kind." 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. Further, 11 CFR §114.2(f) prohibits corporations and labor organizations from facilitating the making of contributions to candidates or political committees, other than to the separate segregated funds of the corporations and labor organizations. Facilitation means using corporate or labor organization resources or facilities to engage in fundraising activities in connection with any federal election. The use of corporate or labor organization resources in connection with a fundraiser is permissible only if the corporation or labor organization receives **advance** payment for the fair market value of such services.